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October 16, 2000

Ex Parte

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC   20554

RE: Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Massachusetts, Docket No. 00-176

Dear Ms. Salas:

The information provided in the attached letter was prepared in response to questions raised by CCB staff in the above proceeding. The twenty-page limit therefore does not apply as set forth in DA 00-2159.

Please feel free to contact me with any questions.

Sincerely,

cc: E. Einhorn
        S. Pie

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Attachment

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Executive Director
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October 16, 2000

Mr. Eric Einhorn
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

EX PARTE OR LATE FILED

Re: *Application by Verizon New England Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Massachusetts,*
     Docket No. 00-176

Dear Mr. Einhorn,

This letter responds to requests from Commission Staff for additional information about the process used to perform the special studies related to DSL services that were included in Verizon 's application (Appendix A, Volume 3, Attachments K and L).

Attachment L demonstrates that, in June and July, for CLECs providing DSL, the due date Verizon confirmed met the due date requested by the CLEC or the correct standard interval (if the CLEC inappropriately requested an interval shorter than the standard interval) 97.69% of the time. To perform this study, Verizon first identified those CLECs whose primary business was providing DSL services. Verizon identified six such CLECs in June and eight such CLECs in July. Verizon then queried the Master PON file to find all LSRs submitted by these CLECs. Verizon ran a search on the identified LSRs to check whether the confirmed due date matched or bettered the requested due date. The number of such LSRs is shown in the fourth column of Attachment L ("Number of Orders where the Confirmed Due Date met the Requested Due Date").

For all LSRs where the confirmed due date did not match the requested due date, Verizon followed slightly different processes in June and July. In June, the file of these LSRs did not retain information on whether the CLEC had pre-qualified the loop. Therefore, Verizon used the identifying numbers of the LSRs to search another database (Service Order Record Database, or "SORD") for the service orders generated from the LSRs. Verizon then examined the service orders to eliminate any that were not for DSL service and, for the DSL orders, to determine whether the CLEC had pre-qualified the loop or not. Beginning with July data, the LSR file captured and retained information on whether the CLEC had pre-qualified the loop. For July, therefore, Verizon was able to check these LSRs for an indicator showing whether the loop had been pre-qualified or not.

For each order in June and July where the confirmed due date did not match the requested due date, Verizon also examined the application date and the confirmed due date to determine the appointed interval. Verizon then compared that interval with the appropriate standard interval – 6 days for orders where the loop was pre-qualified and 9 days for orders where the loop was not pre-qualified. If the appointed interval was less than or equal to the appropriate standard interval, Verizon counted the order in the seventh column of Attachment L ("Number of Orders where Due Date provided was the Standard Interval for the Type of Request").

Verizon then added the number in the fourth column and the number in the seventh column together. The sum is shown in the eighth column ("Number of Orders where Due Dates Matched and Number of Orders where the Correct Interval was Provided"). Verizon then divided the number in the eighth column by the number in the third column ("Total Number of Orders for CLEC DSL providers") to obtain the result in the last column.

Attachment K demonstrates that Verizon offers and provisions xDSL services to CLECs in non-discriminatory intervals. To perform this study, Verizon took the lists for June and July, generated for the Attachment L study, of LSRs for which the committed due date did not match the requested due date. Verizon then matched those LSRs with completed service orders in SORD.

Verizon took the completed service orders generated from this process and sorted them into two groups for each month – one group of orders where the loops were pre-qualified and one where the loops had not been pre-qualified. Finally, Verizon ran the carrier-to-carrier metric calculations on each group separately to determine the average interval offered and average interval completed for each group.

If you have any questions regarding this matter, please do not hesitate to call me.

Sincerely,

Sue May

cc: E. Einhorn
        S. Pie